



REQUEST FOR CATEGORICAL EXCLUSION

PROJECT/ACTIVITY DATA

Project/Activity Name:	Mozilla Foundation: Training for Responsible AI and Computer Science (TRACS) & Strengthening Data Ecosystems (SDE)
Geographic Location(s) (Country/Region):	Global
Amendment (Yes/No), if Yes indicate # (1, 2...):	No
Implementation Start/End Dates (FY or M/D/Y):	10/1/2021-9/30/2024
If Amended, specify New End Date:	
Solicitation/Contract/Award Number(s):	TBD
Implementing Partner(s):	Mozilla Foundation
Bureau Tracking ID:	DDI-21-189
Tracking ID of Related RCE/IEE (if any):	N/A
Tracking ID of Other, Related Analyses:	N/A

ORGANIZATIONAL/ADMINISTRATIVE DATA

Implementing Operating Unit(s): (e.g. Mission or Bureau or Office)	DDI/ITR/T
Other Affected Operating Unit(s):	N/A
Lead BEO Bureau:	DDI
Funding Operating Unit(s): (e.g. Mission or Bureau or Office)	DDI/ITR/T
Funding Account(s) (if available):	DDI/ITR/T
Original Funding Amount:	\$1,200,000
If Amended, specify funding amount:	
If Amended, specify new funding total:	
Prepared by:	Shachee Doshi
Date Prepared:	8/5/2021

ENVIRONMENTAL COMPLIANCE REVIEW DATA

Analysis Type:	<input checked="" type="checkbox"/> Request for Categorical Exclusion <input type="checkbox"/> Deferral
Environmental Determination(s):	<input checked="" type="checkbox"/> Categorical Exclusion(s) <input type="checkbox"/> Deferred (per 22 CFR 216.3(a)(7)(iv))
RCE Expiration Date (if applicable):	
Additional Analyses/Reporting Required:	
Climate Risks Identified (#):	Low <input checked="" type="checkbox"/> # 9 Moderate ___ # ___ High ___ # ___
Climate Risks Addressed (#):	Low <input checked="" type="checkbox"/> # 9 Moderate ___ # ___ High ___ # ___

THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

PROJECT SUMMARY

DDI/ITR/T seeks to partner with Mozilla Foundation to work on the following activities.

- Training for Responsible AI and Computer Science (TRACS): This activity includes the program design, launch, and execution of a challenge competition in select USAID partner countries to support the development of responsible, ethical-centered computer science training programs/curricula at higher education institutions or Technical and Vocational Education and Training (TVETs). The broader goal of this work is to strengthen the data science/computer science workforce in-country so that technologists and other key CS stakeholders can shape the digital ecosystem in a responsible, locally relevant way, and build resilience against external influences on the digital ecosystem.
- Strengthening Data Ecosystems (SDE): This activity will develop and apply approaches, tools, and resources to strengthen the data ecosystems, support data stewardship, and improve the digital enabling environment in USAID partner countries. The target outcomes include increased data sharing, increased data literacy, increased agency for individuals and groups, and increased transparency and accountability.

ENVIRONMENTAL DETERMINATIONS

Request for Categorical Exclusion based on the following class of actions included in §216.2(c)(2)(x):

§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)

§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.)

The following table summarizes the environmental determinations applicable to the specific project:

TABLE 1: ENVIRONMENTAL DETERMINATIONS

Projects/Activities	Categorical Exclusion Citation (if applicable)	Deferral ¹
Activity 1 - Design and Launch a Responsible Computer Science Challenge Program	§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)	<input type="checkbox"/>

¹ Deferrals must be cleared through an Amendment to this RCE prior to implementation of any deferred activities.

	§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).	
Activity 2 - Develop and apply approaches, tools, and resources to strengthen data ecosystems in partner countries	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).</p>	<input type="checkbox"/>

CLIMATE RISK MANAGEMENT

The design teams considered the potential effect of climate risks/stressors on the sustainability of the project. Only *Low* risks were identified, and these risks can be managed. Please see *Annex 1: Activity Climate Risk Management Summary Table for Mozilla* for additional detail.

Mozilla Foundation views environmental sustainability as a core trait of their culture and product development and has a set of Climate Commitments.^{2,3} Mozilla Foundation measures its greenhouse gas emissions and has mitigation plans to reduce their carbon footprint over time. MF does not have any alarming environmental activities and to the best of our knowledge has not violated any environmental laws or regulations.

We anticipate minimal environmental impact for the TRACS & SDE activities. The TRACS challenge will be largely planned, launched in a few USAID partner countries, and managed remotely by USAID and Mozilla Foundation. Challenge competitors will submit their applications online, and be evaluated remotely. The SDE activity will likely be a combination of convenings, workshops, training events, and development of knowledge products. There may be minimal travel to partner countries if required.

BEO SPECIFIED CONDITIONS OF APPROVAL

² https://wiki.mozilla.org/Projects/Sustainability#Mozilla.27s_Climate_Commitment_and_Activities

³ <https://blog.mozilla.org/en/mozilla/mozillas-climate-commitments/>

COVID-19 Condition: In order to reduce COVID-19 transmission during implementation of this activity, the IP must:

- Ensure that all activities addressed by this IEE adhere to current, applicable COVID-19 guidelines. Such measures may include, but are not limited to social distancing, use of personal protective equipment, limiting the size of gathering and travel, and effective disinfection.
- Follow:
 - Applicable COVID-19 guidance from local authorities.
 - The following Agency-wide “COVID-19 GUIDANCE FOR IMPLEMENTING PARTNERS PAGE” page on the USAID website: <https://www.usaid.gov/work-usaid/resources-for-partners/covid-19-guidance-implementing-partners>
 - Ensure that all involved staff have appropriate training, authorization, and resources to meet the expectations of the applicable guidance while implementing these activities.

IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Section 3 of this RCE and any BEO Specified Conditions of Approval.

USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION

PROJECT/ACTIVITY NAME: Mozilla Foundation

Bureau Tracking ID: DDI-21-189

Approval:	<u>Christopher Burns</u> Christopher Burns, DDI/ITR/T Division Director	<u>08/10/2021</u> Date
Clearance:	<u>Aubra Anthony</u> Aubra Anthony, TRACS Activity Manager	<u>08/09/2021</u> Date
Clearance:	<u>Mikael Baker</u> Mikael Baker, SDE Activity Manager	<u>08/09/2021</u> Date
Clearance:	<u>Taylor Braun-Dorrell</u>	<u>08/09/2021</u>
Clearance:	<u>Kenneth MacClune</u> Ken MacClune, DDI Climate Integration Lead	<u>08/25/2021</u> Date
Concurrence:	<u><i>Teresa Bernhard</i></u> Teresa Bernhard, Bureau Environmental Officer	<u>09/13/2021</u> Date

DISTRIBUTION:

1.0 PROJECT AND ACTIVITY DESCRIPTION

1.1 PURPOSE OF THE RCE

The purpose of this document is to establish that all proposed projects/activities belong to classes of actions eligible for Categorical Exclusions as set out in Agency regulations (22 CFR 216.2(c)) and that there are no foreseeable significant direct or indirect impacts that would preclude them from receiving a Categorical Exclusion. Upon approval of this document, the Categorical Exclusions are affirmed for the project/activity. This analysis also documents the results of the project/activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201 mandatory reference 201mal).

This RCE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

1.2 PROJECT OVERVIEW

- Training for Responsible AI and Computer Science (TRACS): This activity includes the program design, launch, and execution of a challenge competition in select USAID partner countries to support the development of responsible, ethical-centered computer science training programs/curricula at higher education institutions or Technical and Vocational Education and Training (TVETs). The broader goal of this work is to strengthen the data science/computer science workforce in-country so that technologists and other key CS stakeholders can shape the digital ecosystem in a responsible, locally relevant way, and build resilience against external influences on the digital ecosystem.
- Strengthening Data Ecosystems (SDE): This activity will develop and apply approaches, tools, and resources to strengthen the data ecosystems, support data stewardship, and improve the digital enabling environment in USAID partner countries. The target outcomes include increased data sharing, increased data literacy, increased agency for individuals and groups, and increased transparency and accountability.

No environmental or medical waste will be generated as a direct result of these activities.

1.3 PROJECT/ACTIVITY DESCRIPTION

- Training for Responsible AI and Computer Science (TRACS): USAID and Mozilla intend to promote an ethical shift in computing education by launching a challenge competition in specific countries/regions for higher education institutions and/or vocational training institutions and academies.
 - Stage 1: Launch a challenge in a limited subset of countries or regions based on market factors indicating high likelihood of implementation and potential impact. These factors include, but are not limited to, an existing network of leading higher education institutions and vocational training opportunities; a strong local computer science jobs market; and USAID Mission buy-in
 - Stage 2: Expand challenge to multiple countries/regions

- **Strengthening Data Ecosystems (SDE):** USAID and Mozilla are committed to accelerating more equitable data governance alternatives to address worldwide data stewardship challenges and disparities. The activity will include co-creating approaches, tools, and resources to strengthen country data ecosystems in 1-2 countries. Through co-creation, USAID and Mozilla will discern which data ecosystem challenges to center on and how to target them, through mechanisms such as convenings, workshops, training events, and knowledge products. By Strengthening Data Ecosystems, USAID can empower individuals, groups, governments, and CSOs to be better equipped to produce, understand, use, and share data to solve pressing challenges with evidence-based approaches. These evidence-based approaches could be applied to climate resilience, global health, food security, economic growth, etc.

TABLE 2: DEFINED OR ILLUSTRATIVE PROJECTS/ACTIVITIES AND SUB-ACTIVITIES

Activity 1: Responsible Computer Science Challenge
Activity 2 Strengthening Data Ecosystems

2.0 ENVIRONMENTAL ANALYSIS

2.1 JUSTIFICATION FOR CATEGORICAL EXCLUSION

The activities under the USAID and Mozilla RCE and SDE activities are among the classes of actions listed in 22 CFR 216.2(c)(2) and have no foreseeable significant direct or indirect adverse effect on the environment. Therefore, under 22 CFR 216.2(c)(1), neither an IEE nor an EA will be required for these activities. Instead, a Categorical Exclusion is recommended for the projects/activities described above in Section 1.3 as follows:

(Insert relevant citation).

TABLE 3: RECOMMENDED DETERMINATION FOR CATEGORICAL EXCLUSION

Project/Activity and Sub-Activity #	Recommended Determination for Categorical Exclusion
Activity 1 - Responsible Computer Science challenge	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.).</p> <p>§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).</p>
Activity 2 - Strengthening Data Ecosystems	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.).</p>

	§216.2(c)(2)(xiv) Studies, projects or programs intended to develop the capability of recipient countries to engage in development planning, except to the extent designed to result in activities directly affecting the environment (such as construction of facilities, etc.).
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2.2 CLIMATE RISK MANAGEMENT

This section summarizes the methodology used and findings of the CRM Screening, in accordance with [ADS 201mal](#) (see Annex 1). The project design team, in consultation with the Climate Integration Lead (CIL), considered the potential effect of climate risks/stressors on the sustainability of the project (changing precipitation patterns, rising temperature, floods, droughts, severe weathers, vulnerabilities, etc.).

Only *Low* risks were identified, and these risks can be managed. Please see *Annex 1: Activity Climate Risk Management Summary Table for Mozilla* for additional detail.

3.0 LIMITATIONS OF THE CATEGORICAL EXCLUSION

The categorical exclusions recommended in this document apply only to projects/activities and sub-activities described herein.

Other projects/activities that may arise must be subject to an environmental analysis and the appropriate documentation prepared and approved, whether it be a new Request for Categorical Exclusion, an amendment, or other type of 22 CFR 216 document.

It is confirmed that the projects/activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22 CFR 216.2(d).

3.1 MANDATORY INCLUSION OF ENVIRONMENTAL COMPLIANCE REQUIREMENTS IN SOLICITATIONS, AWARDS, BUDGETS, AND WORK PLANS

USAID will ensure the environmental compliance requirements are incorporated into solicitations, awards, budgets, and work plans, including relevant limitations of Section 3 above. In addition, climate risk management requirements will also be incorporated.

3.2 GENERAL IMPLEMENTATION & MONITORING REQUIREMENTS (IF APPLICABLE)

USAID will ensure that the following requirements are met:

- Provide briefings for Implementing Partner (IP) on environmental compliance responsibilities
- Ensure integration of compliance responsibilities in prime and sub-awards and grant agreements;
- Ensure compliance with applicable partner country requirements
- Annual review of project activities to ensure that scope is still covered by Categorical Exclusion

ATTACHMENTS:

Annex 1: Activity Climate Risk Management Summary Table for Mozilla

ANNEX 1. **ACTIVITY** CLIMATE RISK MANAGEMENT SUMMARY TABLE FOR MOZILLA

Tasks/Defined or Illustrative Interventions	Climate Risks ⁴	Risk Rating ⁵	How Risks are Addressed ⁶	Opportunities to Strengthen Climate Resilience ⁷
Activity 1: Responsible Computer Science Challenge	Air Travel - air travel contributes to greenhouse gas emissions	Low	<p>The activity will likely have little international air travel, resulting in minimal climate impact directly resulting from implementation. Mozilla's Climate Commitments include reducing emissions and using carbon offsets for unavoidable emissions.</p> <p>Consider developing virtual trainings to reduce dependency on in-person capacity building events.</p> <p>Ensure timely communication of climate risks to beneficiaries.</p> <p>The activity will use back-up generator power, if available, during power outages.</p> <p>The activity will build flexibility into planning of in-person activities, including convenings and training events in seasons/months where weather has the potential to impact implementation.</p>	<p>Educating a new wave of graduating computer engineers to bring holistic thinking and a "responsible use" lens to the design of technology products/platforms will increase income opportunities and strengthen livelihoods, protecting communities against future shocks that may be experienced due to climate events.</p>
	Weather - severe weather events could cause power outages that interrupt internet connectivity and contribute to delays	Low		
	Weather - severe weather events could cause flooding that could impact ground transportation	Low		
Activity 2: Strengthening	Air Travel - air travel contributes to greenhouse gas emissions	Low	The activity will likely have little international air travel, resulting in minimal	Building institutions and individuals' capacity to produce

⁴ List key risks related to the defined/illustrative interventions identified in the screening and additional assessment.

⁵ Low/Moderate/ High

⁶ Describe how risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you choose to accept the risk, briefly explain why.

⁷ Describe opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures

Data Ecosystems	Weather - severe weather events could cause power outages that interrupt internet connectivity and contribute to delays	Low	climate impact directly resulting from implementation. Mozilla’s Climate Commitments include reducing emissions and using carbon offsets for unavoidable emissions. Incorporate climate change into service delivery training activities Consider developing virtual trainings to reduce dependency on in-person capacity building events. The activity will use back-up generator power, if available, during power outages. The activity will build flexibility into planning of in-person activities, including convenings and training events in seasons/months where weather has the potential to impact implementation.	and share data and developing a more data literate society will lead to better awareness of and action on climate issues, health issues, food security issues, economic issues, and other development issues. Account for climate change in research and assessments. Develop contingency plans for different weather / climate events to ensure business continuity
	Sea level rise, increased temperatures and variability in rainfall, as well as increased intensity, duration, and/or frequency of extreme climate-related events such as droughts or floods may disrupt logistic networks to deploy staff and equipment, impede access routes, and damage sites where the technologies	Low		
	Weather - severe weather events could cause flooding that could impact ground transportation	Low		
	Flooding and severe weather events could cause damage and destruction of communications hardware and software, development of online resources important in the analyses, studies, workshop materials and meeting notes.	Low		